

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TIERRA INTELECTUAL BORINQUEN, INC. Plaintiff	CASE NO. 2:13-cv-39-JRG <b>CONSOLIDATED LEAD CASE</b>
v.	
HTC CORPORATION et al., Defendants	
TIERRA INTELECTUAL BORINQUEN, INC. Plaintiff,	CASE NO. 2:13-cv-47-JRG
v.	
TOSHIBA CORPORATION, et. al., Defendants	

**P.R. 4-5 JOINT CLAIM CONSTRUCTION CHART**

Pursuant to P.R. 4-5(d), Plaintiff Tierra Intellectual Borinquen, Inc. (“Tierra”) and Defendants HTC Corporation, HTC America, Inc. (together, “HTC”), Toshiba Corporation, Toshiba America Information Systems, Inc. (together, “Toshiba”) (collectively, “Defendants”) hereby submit their Joint Claim Construction Chart in accordance with the Court’s September 3, 2013 Docket Control Order. (Docket No. 43).

Attached hereto as Exhibit A is the Joint Claim Construction Chart, which includes the disputed claim terms and phrases, the parties’ respective proposed claim constructions, and a column for the Court’s construction of the disputed claim terms and phrases.

Date: April 22, 2014

Respectfully submitted,

/s/ Eugenio J Torres-Oyola

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served this 22nd day of April, 2014, with a copy of the foregoing document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3).

/s/ Eugenio J. Torres-Oyola  
Eugenio J. Torres-Oyola

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h), and that this motion is jointly filed.

/s/ Eugenio J. Torres-Oyola  
Eugenio J. Torres-Oyola